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ATTORNEYS FOR
DEFENDANT NETFLIX, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BROADCOM CORPORATION *et al.*,

Plaintiffs,

v.

NETFLIX, INC.,

Defendant.

Case No. 3:20-cv-04677-JD

**JOINT STIPULATION FOR EXTENSION
OF TIME; [PROPOSED] ORDER**

Dept.: Courtroom 11, 19th Floor
Judge: Honorable James Donato

Date Filed: March 13, 2020
Trial Date: February 12, 2024

Pursuant to Local Rules 6-2 and 7-12, Plaintiffs Broadcom Corporation and Avago Technologies International Sales PTE. Limited (collectively, “Broadcom”) and Defendant Netflix, Inc. (“Netflix”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and request as follows:

SHOWING OF GOOD CAUSE

WHEREAS, the Parties have a dispute about the adequacy of Broadcom’s privilege log;

WHEREAS, Netflix detailed its objections to Broadcom’s privilege log in a letter dated February 7, 2023;

WHEREAS, the parties met and conferred telephonically about this dispute as required by the Court’s Standing Order for Civil Discovery, § 18, on April 12, 2023;

WHEREAS, the parties previously filed a Stipulation [Dkt. 366] setting deadlines for Broadcom to provide an updated privilege log and to produce certain materials previously withheld and for Netflix to file a motion for leave to file a motion to compel regarding the privilege-log issues, if necessary;

WHEREAS, on May 3, 2023, the parties met and conferred telephonically about extending the previously stipulated deadlines for the parties’ respective privilege-log issues by one week each to accomplish the tasks involved;

WHEREAS, the Parties have agreed that Broadcom will comply with the terms of the prior Stipulation relating to the privilege-log issues by May 19, 2023, and Netflix shall have until June 2, 2023 (two weeks after May 19, 2023) to file motion for leave to file a motion to compel regarding Broadcom’s privilege log, if necessary;

NOW THEREFORE, the Parties respectfully request that this Court order the following modification to the Scheduling Order:

Event	Current Deadline	Proposed Deadline
Deadline to seek leave to file a motion to compel regarding Broadcom’s response to Interrogatory No. 7	May 11, 2023	<i>Unchanged</i>

1	Deadline for Broadcom to		
2	amend or supplement its		
3	privilege log as provided in	May 12, 2023	May 19, 2023
4	the Parties' April 14, 2023		
5	Stipulation [Dkt. 366]		
6	Deadline for Netflix to seek		
7	leave to file a motion to	May 26, 2023	June 2, 2023
8	compel regarding privilege-		
9	log deficiencies		
10	Rebuttal expert disclosures	June 6, 2023	<i>Unchanged</i>
11	Supplemental rebuttal expert		
12	disclosure by Broadcom's	June 16, 2023	<i>Unchanged</i>
13	validity expert as to the '976		
14	patent		
15	Expert discovery cut-off	June 30, 2023	<i>Unchanged</i>
16	Last day to file dispositive		
17	and <i>Daubert</i> motions	July 21, 2021	<i>Unchanged</i>
18	Exchange of deposition and		
19	discovery response	August 2, 2023	<i>Unchanged</i>
20	designations		
21	Deadline to file responsive		
22	briefs to dispositive	August 11, 2023	<i>Unchanged</i>
23	and <i>Daubert</i> motions		
24	Lead trial counsel to meet and		
25	confer re: preparation of joint	August 18, 2023	<i>Unchanged</i>
26	pretrial materials		
27	Exchange counter-		
28	designations and objections to	August 23, 2023	<i>Unchanged</i>
	deposition and discovery-		
	response designations		
	Deadline to file reply briefs to		
	dispositive	August 25, 2023	<i>Unchanged</i>
	and <i>Daubert</i> motions		
	Exchange exhibits and exhibit		
	lists	November 23, 2023	<i>Unchanged</i>
	Exchange objections to	December 7, 2023	<i>Unchanged</i>

1	exhibit lists		
2	Exchange witness lists	December 7, 2023	<i>Unchanged</i>
3	Parties exchange motions <i>in</i>	December 14, 2023	<i>Unchanged</i>
4	<i>limine</i>		
5	Parties exchange oppositions	December 21, 2023	<i>Unchanged</i>
6	to motions <i>in limine</i>		
7	Pretrial filings	December 26, 2023	<i>Unchanged</i>
8	Pretrial conference	January 25, 2024, at 1:30 p.m.	<i>Unchanged</i>
9	Parties to file deposition and		
10	discovery designations,	February 1, 2024	<i>Unchanged</i>
11	including counter-		
12	designations and objections		
13	Jury Trial	February 12, 2024, at 9:00 a.m.	<i>Unchanged</i>

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

HONORABLE JAMES DONATO
UNITES STATES DISTRICT JUDGE

KEKER, VAN NEST & PETERS LLP

/s/ Richard L. Wynne, Jr.

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/s/ Sharif E. Jacob

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DEFENDANT NETFLIX, INC.

ATTESTATION

In accordance with Civil Local Rule 5-1(h)(3), I attest that each of the signatories have concurred in the filing of this document.

Dated: May 4, 2023

By: /s/ Richard L. Wynne, Jr.